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Part VIII

Department of the Interior

Geological Survey

Final Revision of Certain Requirements of Outer Continental Shelf (OCS) Orders Nos. 1, 2, 5, and 7

DEPARTMENT OF THE INTERIOR

Geological Survey

Final Revision of Certain Requirements of Outer Continental Shelf (OCS) Orders Nos. 1, 2, 5, and 7

Notice is hereby given that, pursuant to Title 30 of the Code of Federal Regulations, Part 250.10 and Part 250.11 (30 CFR 250.10 and 250.11), and the U.S. Geological Survey (USGS) Director's Delegation of Authority, as published in the **Federal Register**, Volume 45, No. 52, on March 14, 1980, the Deputy Chief, Conservation Division—Offshore Minerals Regulation, has approved the issuance of revisions to the Outer Continental Shelf (OCS) Orders Nos. 1, 2, 5, and 7 for the following OCS Areas: Gulf of Mexico, Pacific, Gulf of Alaska, and Atlantic.

These revisions to the OCS Orders will be effective September 15, 1980. The revised paragraphs and subparagraphs of these Orders supercede the corresponding paragraphs and subparagraphs currently in effect for the OCS Areas listed above, which were published in the **Federal Register**, Volume 44, No. 247, on December 21, 1979.

These revisions incorporate appropriate suggestions which were received in response to a solicitation for comments which was published in the **Federal Register**, Volume 45, No. 71, on April 10, 1980. They also incorporate appropriate suggestions which were received at a public meeting at the USGS National Center in Reston, Virginia, on May 20, 1980.

In accordance with the USGS Director's Delegation of Authority, which was published in the **Federal Register**, Volume 45, No. 52, on March 14, 1980, the change of the title of the position of the "Oil and Gas Supervisor" to "Deputy Conservation Manager" has been incorporated as well as the redelegation of the authority of the "Chief, Conservation Division," to the "Deputy Chief, Conservation Division—Offshore Minerals Regulation," for the approval of the Orders. The new titles of these positions and approval authority are effective throughout all of the OCS Orders. These title changes will be incorporated into the booklet copies of the remainder of the OCS Orders when the next edition of the booklet is issued.

These revisions will also be incorporated into the final Arctic OCS Orders when published. The proposed Arctic OCS Orders were published in the **Federal Register**, Part 5, Volume 44, No. 115, on June 13, 1979.

Comments were received from the following organizations: Alaska Oil and Gas Association, Amoco Production Company, Arco Oil and Gas Company, Cameron Iron Works, Inc., Chevron U.S.A., Inc., Conoco, Inc., Environmental Protection Agency, Exxon Company, U.S.A., Gulf Oil Exploration and Production Company, Huthnance Drilling Company, National Oceanic and Atmospheric Administration, Ocean Drilling and Exploratioin Company, Offshore Operators Committee, Otis Engineering Corporation, Shell Oil Company, Zapata Corporation.

Summaries of the comments received, discussions for accepting or rejecting the suggestions of the commenters, and the final revisions of the Orders are published below. The requirements of certain paragraphs and subparagraphs are different for the various Areas due to environmental, geological, geophysical, or geographical differences. The Areas which are affected by these varying requirements are identified following the headings for each of the final revisions of the Orders. Revised insert pages of the final revisions, suitable for placement in the booklet copies of the Orders for each Area, can be obtained from the addresses listed below.

The primary author of this document is Mr. Lloyd M. Tracey, Chief, OCS Orders and Standards Section, Branch of Offshore Rules and Procedures, Conservation Division, U.S. Geological Survey, Mail Stop 640, Reston, Virginia 22092 (703–860–7835). Reprints of this Notice and copies of the revised insert pages can be obtained after September 15, 1980, from the following:

Conservation Manager, Gulf of Mexico OCS Region, U.S. Geological Survey, P.O. Box 7944, Metairie, Louisiana 70011.
Conservation Manager, Atlantic OCS Region, U.S. Geological Survey, 1725 K Street, N.W., Suite 204, Washington, D.C. 20006.
Conservation Manager, Alaska OCS Region, U.S. Geological Survey, P.O. Box 259, Anchorage, Alaska 99510.
Conservation Manager, Pacific OCS Region, U.S. Geological Survey, 1340 West Sixth Street, Los Angeles, California 90017.
Deputy Chief, Conservation Division—Offshore Minerals Regulation, U.S. Geological Survey, Mail Stop 640, National Center, Reston, Virginia 22092.

Dated: August 13, 1980.

Robert L. Rioux,

Deputy Chief, Conservation Division—Offshore Minerals Regulation, Conservation Division.

OCS Order No. 1

Paragraph 4, *Identification of Subsea Objects*

Comments. The U.S. Coast Guard and others have expressed concern that excessive reports are being filed because the currently effective Order does not place any limitations on the objects which are to be reported.

Discussion. The USGS proposes to revise paragraph 4 of OCS Order No. 1 as set forth below. The U.S. Coast Guard will forward all reports disclosing potential obstructions to the National Marine Fisheries Service for appropriate inclusion on the list of obstructions to fishing devices which is published in the Weekly Notice to Mariners by the Defense Mapping Agency Hydrographic/Topographic Center. The Notice to Mariners will be distributed to all USGS District Supervisors. This publication is available from: DMAOOS, Code IMA, 650 Brookes Lane, Washington, D.C. 20315.

The U.S. Coast Guard also intends to publish a Notice which will outline the method of position fixing.

Comments. There was a wide divergence of opinion on the proposed revision of this paragraph. One commenter agreed with the proposed revision; another contended that the 40-pound limitation on the reporting of objects was too low; and another contended that this limitation was too high. The first commenter stated that "* * * a 6" ANSI 600 series weld neck flange weights 73 lbs., and an 8" ANSI 600 series flange weights 112 lbs. and these would not be considered an

obstruction." This commenter suggested that the limitation should be 120 pounds or less. Another commenter suggested the limitation should be 150 pounds. The opposing view maintains that 55-gallon drums are a major cause of net damage. It was contended that "* * * platform workers knock holes in the drums and throw them into the Gulf rather than return them to the shore. The drums weigh less than 40 pounds empty, but on the sea floor filled with mud they weigh half a ton or more. Often they rip through the net wings or through the bottom of the net causing the loss of a catch."

This commenter also contended that batteries and diesel fuel filters would also weigh less than 40 pounds, and these items have caused damage to fishing nets.

Discussion. The 40-pound weight limitation was selected because the USGS determined that a 55-gallon steel drum without a top weighs approximately 42 pounds. Therefore, any 55-gallon steel drum lost, with or without a top, would be required to be reported. The disposal of material such as containers, batteries, and diesel fuel filters is prohibited by OCS Order No. 7, subparagraphs 1.2, *Solid Material Disposal*, 1.2.2, *Containers*, and 1.2.3, *Equipment*. Engine starting batteries weigh 45 to 55 pounds and, therefore, would be a reportable item. It would appear that the 40-pound weight limitation is reasonable.

Comments. It was suggested that subparagraph 4.b should be revised to separate the weight limitation from the configuration limitation. It was contended that the configuration limitation should be treated alone since it alone provides sufficient reason for exclusion.

Discussion. The USGS disagrees with this contention. The intent was to require the reporting of light bulky items which would damage fishing nets regardless of weight.

Comments. It was suggested that a new subparagraph 4.d should be added to the Order as follows:

"d. Are located within 150 feet of fixed structures on which approved aids to navigation are maintained."

It was contended that prudent fishermen would maintain this distance for safety.

Discussion. The USGS agrees with the intent of this suggestion and has revised the subparagraph to include a new subparagraph 4.c as follows:

"c. Are determined to be located on the seafloor within 46 meters (150 feet) of fixed structures on which approved aids to navigation are maintained."

The phrase "determined to be located on the seafloor" was added because an accidentally dropped object may roll or be carried by currents more than 150 feet from the structure and, therefore, could present a hazard to fishing gear. Paragraph 4 is hereby revised as set forth below:

Final Revision of OCS Order No. 1, Paragraph 4, Identification of Subsea Objects

All OCS Areas:

4. *Identification of Subsea Objects.* Prior to the installation of subsea equipment required for lease operations, or in the event of the accidental sinking of an object, the owner shall report the submerged equipment or object to the appropriate U.S. Coast Guard District Commander subject to the following limitations. Reports are not required for equipment or objects that:

a. Are submerged in water depths greater than 305 meters (1,000 feet); or

b. Weigh 18 kilograms (40 pounds) or less and are of such shape or configuration that they are unlikely to snag or damage fishing devices; or

c. Are determined to be located on the seafloor within 46 meters (150 feet) of fixed structures on which approved aids to navigation are maintained.

The report shall contain the object's description, weight, dimensions, location, and the depth of water in which it is located. The U.S. Coast Guard will determine if it is a hazard to navigation and will determine whether it requires marking in accordance with 33 CFR 64.

Paragraph 5, *Marking of Equipment*

Comments. Several commenters commented on the content of this paragraph.

Discussion. As stated in the Federal Register on April 10, 1980, Volume 45, No. 71, appropriate comments received in response to the solicitation for comments on 30 CFR 250.54 would be considered in the development of the final revision of paragraph 5 of OCS Order No. 1. These comments have been incorporated into a proposed revision of paragraph 5 which was published in the Federal Register, Volume 45, No. 117, June 16, 1980. Comments are to be submitted by August 15, 1980. These comments will be analyzed and appropriate suggestions will be incorporated into an additional final revision of paragraph 5 which will be published in the Federal Register in the near future.

OCS Order No. 2

Subparagraphs 2.2, *Mobile Drilling Units*, Item c (Pacific, Gulf of Alaska, and Atlantic), 2.3, *Well-Site Surveys* (Gulf of Mexico), and 2.1.3, *Well-Site Surveys* (Pacific, Gulf of Alaska, and Atlantic).

Comments. It was suggested that the requirement of subparagraph 2.2, Item c, should be applicable only to the Pacific, Gulf of Alaska, and Atlantic Areas. Several commenters suggested that the submittal of seabed data should be selectively required for unusual conditions such as mud slides.

Discussion. Paragraph 2 of OCS Order No. 2 for the Gulf of Mexico does not contain a subparagraph 2.2c which addresses *Mobile Drilling Units*. The insertion of the heading "All OCS Areas" was an editorial error. The USGS has reviewed the criteria for requiring this data and has determined that seabed data is important for the determination of the stability of mooring points and for the stability of the location for subsea blowout-preventer stacks. Therefore, the USGS intends to revise the Order for all Areas to allow the District Supervisors to selectively require the submittal of the data as indicated in italics below. It should be noted that subparagrah 2.1.3 for the Pacific has been revised to require the data to be submitted to the Deputy Conservation Manager, Offshore Field Operations, instead of the District Supervisor.

Final Revision of OCS Order No. 2, Subparagraphs 2.2, Mobile Drilling Units, Item c (Pacific, Gulf of Alaska, and Atlantic), 2.3, Well-Site Surveys (Gulf of Mexico), and 2.1.3, Well-Site Surveys (Pacific, Gulf of Alaska, and Atlantic)

Gulf of Mexico:

2.3 *Well-Site Surveys.* Lessees shall submit a shallow geologic hazards report and conduct such shallow geologic hazard surveys or other surveys as required by the *Deputy Conservation Manager (DCM), Offshore Field Operations.* The results of these surveys and an analysis of the geologic hazards shall be furnished to the District Supervisor. All data obtained from the surveys and all geophysical data relating to shallow hazards shall be furnished upon request to the District Supervisor. *When requested, this data shall include sediment and seabed data, e.g., seabed profiles, sediment consistency, allowable bearing and sliding loads, and nearby potential seabed hazards, i.e., sand waves, slumps, and mud slides.*

Pacific:

2.1.3 *Well-Site Surveys.* Lessees shall submit a shallow geologic hazards report and conduct such shallow geologic hazard surveys or other surveys as required by the *Deputy Conservation Manager (DCM), Offshore Field Operations.* The results of these surveys and an analysis of the geologic hazards shall be furnished to the *DCM, Offshore Field Operations.* All data obtained from the surveys and all geophysical data relating to shallow hazards shall be furnished upon request to the *DCM, Offshore Field Operations. When requested, this data shall include sediment and seabed data, e.g., seabed profiles, sediment consistency, allowable bearing and sliding loads, and nearby potential seabed hazards, i.e., sand waves, slumps, and mud slides.*

Gulf of Alaska, and Atlantic:

2.1.3 *Well-Site Surveys.* Lessees shall submit a shallow geologic hazards report and conduct such shallow geologic hazards surveys or other surveys as required by the *Deputy Conservation Manager (DCM), Offshore Field Operations.* The results of these surveys and an analysis of the geologic hazards shall be furnished to the District Supervisor. All data obtained from the surveys and all geophysical data relating to shallow hazards shall be furnished upon request to the District Supervisor. *When requested, this data shall include sediment and seabed data, e.g., seabed profiles, sediment consistency, allowable bearing and sliding loads, and nearby potential seabed hazards, i.e., sand waves, slumps, and mud slides.*

Pacific, Gulf of Alaska, and Atlantic:

2.2 *Mobile Drilling Units.*

* * * * *

Delete item "c" and reletter item "d" as item "c."

Subparagraph 3.1, *General Requirements (Well Casing and Cementing)*

Comments. It was suggested that the first sentence of the revised footnote should be replaced with the definitive sentence: "Anticipated surface pressure is defined as that surface well pressure which can reasonably be expected to be exerted upon the casing string and its related wellhead equipment."

Discussion. The USGS agrees with the intent of this comment and has revised the first sentence of the footnote.

Comments. The previous commenter also agreed that the revised footnote renders the first sentence of the second paragraph of subparagraph 5.1.1 redundant and suggested that this sentence should be deleted.

Discussion. The USGS has deleted the referenced sentence.

Comments. It was suggested that the last sentence of the footnote should be revised to state:

"The lessee shall include as part of the statement of anticipated surface pressure a statement containing the calculations used to determine this pressure during the drilling phase, the completion phase, and the anticipated surface pressure used for production string design."

It was contended that "The anticipated surface pressure for *production purposes* through the *production casing* is usually based on the estimated bottom hole pressure less the pressure exerted by a column of gas with the hole void of fluid. This type of calculation is *not* appropriate for calculation of anticipated pressure for the drilling and completion phases and our recommended change recognizes this difference."

Discussion. The USGS agrees that the suggested revision would go well with the penultimate sentence of the footnote. The sentence was adopted with minor editorial changes. Refer to the final revision of the footnote.

Comments. It was suggested that the following sentence should be added to the footnote:

"Any reasonable criteria for calculating anticipated surface pressure known to provide safe operations for a particular company in combination with appropriate historical design factors, equipment, and operational practices for the type well proposed shall be deemed acceptable."

It was contended that:

"Technology which has proven safe as well as cost effective for a particular company should not be arbitrarily set aside."

Discussion. The USGS does not agree with this suggestion. The District Supervisor is required to make an engineering judgment on the validity of the calculations used to determine anticipated surface pressure. The second paragraph of subparagraph 3.1 is hereby revised as set forth below in italics. The first, third, and fourth paragraphs of subparagraph 3.1 remain unchanged.

Final Revision of OCS Order No. 2, Subparagraph 3.1, General Requirements

All OCS Areas:

3.1 *General requirements.*

* * * * *

The design criteria considered for all wells shall be submitted with the Application for Permit to Drill. The criteria to be considered shall include all pertinent factors for well control, such as:

a. Formation fracture gradients.

b. Formation pressure.

c. *Anticipated surface pressure.**

d. Casing setting depths.

**Anticipated surface pressure is defined as the surface well pressure which can reasonably be expected to be exerted upon a casing string and its related wellhead equipment. In the calculation of anticipated surface pressure, the lessee shall take into account the drilling, completion, and producing conditions. He shall consider mud densities to be used below various casing strings, fracture gradients of the exposed formations, casing setting depths, total well depth, formation fluid type, and other pertinent conditions. Considerations for calculating anticipated surface pressure may vary for each segment of the well. The lessee shall include as a part of the statement of anticipated surface pressure the calculations used to determine this pressure during the drilling phase and the completion phase, including the anticipated surface pressure used for production string design.*

* * * * *

Subparagraph 5.1.1, *BOP Equipment*

Comments. A large portion of the comments addressed the requirements of this subparagraph. It was the concensus of opinion that the phrase "except that the working pressure of the annular preventer need not exceed 34,475 kPa (5,000 psi)" should be reinstated in the subparagraph. One commenter suggested that a qualifying phrase such as, "If, upon review of an applicant's request for permit to drill, the District Supervisor determines that the blowout preventer equipment proposed for use is not adequate, he may require equipment they limit the use of annular preventers to controlling pressures in the range of 2,000 to 3,500 psi. This limitation is accomplished through the use of prudent well-control procedures."

Discussion. After considering all comments, the USGS has revised subparagraph 5.1.1 as set forth below in italics. It should be noted that the first sentence of the second paragraph of the former subparagraph 5.1.1 has been deleted. The deleted sentence was rendered redundant by the revisions of subparagraph 3.1.

Final Revision of OCS Order No. 2, Subparagraph 5.1.1, BOP Equipment

All OCS Areas:

5.1.1 *BOP Equipment.* Blowout-preventer equipment shall consist of annular preventer and the specified

number of ram-type preventers. The pipe rams shall be of proper size to fit the drill pipe in use. The working pressure of any blowout preventer shall exceed the anticipated surface pressure to which it may be subjected, *except that the working pressure of the annular preventer need not exceed 34,475 kPa (5,000 psi), unless a higher working pressure is required by the District Supervisor. When the anticipated surface pressure exceeds the rated working pressure of the annular preventer, the lessee shall submit with the Application for Permit to Drill a well-control procedure which indicates how the annular preventer will be utilized and the pressure limitations which will be applied during each mode of pressure control.*

All blowout-preventer systems shall be equipped with:

* * * * *

Subparagraph 5.2, *Subsea BOP Requirements,* and Subparagraph 5.3, *Surface BOP Requirements*

Comments. The majority of the commenters objected to the requirements for the third set of pipe rams when a tapered drill string is in use.

Three commenters contended that if the blowout-preventer stack were arranged with the smaller pipe rams between the larger pipe rams and the blind rams, either the small or large drill pipe rams located below the drilling spool could be closed, and the blind rams could then be replaced with a small or large pipe ram if a redundant ram is considered necessary for a long term well-control operation. Another option would be to replace the small pipe rams with large pipe rams for large ram-to-large ram stripping.

Discussion. The USGS does not consider these suggestions as viable alternatives. In the case of the surface blowout-preventer stack, it appears that changing rams with the lower portion of the stack under pressure would be an extremely hazardous operation. Neither commenter indicated that he would attempt such an operation with a subsea blowout-preventer stack. It would appear that, with a subsea blowout-preventer stack, this operation would be impossible or prohibitive from the standpoint of personnel safety. Furthermore, by removing the blind shear ram, the last line of defense, i.e., closing the blind shear rams, shearing the pipe, and moving off location, is forever lost. Another alternative to the third set of pipe rams is suggested in the following comment.

Comments. One commenter suggested the following alternative for the third set of pipe rams:

"The objection that the addition of one set of pipe rams to a surface stack will cost over $100,000 and to a subsea stack, over $250,000, assumes that one blowout-preventer must be added to existing stacks to comply with Order No. 2. However, by simply replacing one set of 5" pipe rams with one set of 2-⅞" through 5" variable bore rams at a cost of about $25,000, the number of preventers in existing subsea and surface stacks is sufficient to comply with Order No. 2."

"Variable bore rams seal on a range of pipe sizes, i.e., 2-⅞" through 5" or 3-½" through 7". In a three ram surface BOP stack, blind/shear or blind rams may be installed in the upper ram cavity, 2-⅞" through 5" variable bore rams in the middle cavity, and 5" in the lower cavity. Middle and lower pipe rams can then be used to seal on the major or 5" pipe string and the middle rams used to seal on the smaller size pipe. Indeed, by using variable bore rams in both pipe ram cavities, two ram preventers would provide double protection for both pipe sizes of a tapered drill string. Drill pipe can be suspended on variable bore ram 2-⅞" through 5" in the same manner as on 5" pipe rams."

Discussion. The USGS reaffirms the rationale contained in the Federal Register Notice of April 10, 1980. However, as a result of comments received at the public meeting on May 20, 1980, and subsequent comments, it has been recognized that certain optional alternative requirements should be incorporated for subsea and surface BOP stacks. Therefore, the requirements for subsea and surface BOP stacks are revised as set forth below. Lessees should plan to use a three pipe ram stack arrangement when a tapered drill string is anticipated for use. In the event of an unplanned requirement for a tapered drill string, or when there are mechanical or physical restraints, the revised requirements provide optional alternatives.

It should be noted that item "d" of subparagraph 5.2, and item "e" of subparagraph 5.3 provide the same redundancy as item "a" of subparagraphs 5.2 and 5.3, and that item "e" of subparagraph 5.2 and item "f" of subparagraph 5.3 provide the same redundancy as item "c" of subparagraphs 5.2 and 5.3. It should also be noted that item "d" of subparagraph 5.3 is not allowed as an option for subsea BOP stacks under subparagraph 5.2, because picking up a crossover sub and switching to the larger size pipe when a well control problem occurs with the smaller pipe within the stack is not a viable option with a subsea stack in deep water. With a subsea stack having only two sets of rams for the larger size pipe, the only course of action with the smaller size pipe within the stack during a blowout might be to shear the small pipe. We believe that operating in this mode should be an exception to approved practice and therefore should only be allowed under exceptional circumstances through the departure procedure; furthermore, the majority of subsea stacks have sufficient cavities to provide redundant pipe rams, and the "last ditch" option of shearing the pipe is always available with subsea stacks.

Final Revision of OCS Order No. 2, Subparagraph 5.2, Subsea BOP Requirements and Subparagraph 5.3, Surface BOP Requirements

All OCS Areas:

5.2 *Subsea BOP Requirements.*

* * * * *

—5. When a tapered drill string is in use, the BOP stack shall be equipped with one of the following pipe ram configurations:

a. Two (2) sets of pipe rams for the larger size string and one (1) set for the smaller size string of drill pipe.

b. Two (2) sets of pipe rams for the larger size string and one (1) set of variable bore pipe rams to fit both sizes of pipe.

c. Two (2) sets of variable bore pipe rams to fit both sizes of pipe.

d. One (1) set of pipe rams for the larger size string and one (1) set of variable bore pipe rams to fit both sizes of pipe.

e. One (1) set of pipe rams for the larger size string, one (1) set of pipe rams for the smaller pipe, and one (1) set of variable bore pipe rams to fit both sizes of pipe.

* * * * *

5.3 *Surface BOP Requirements.*

* * * * *

—2. When a tapered drill string is in use, the BOP stack shall be equipped with one of the following pipe ram configurations:

a. Two (2) sets of pipe rams for the larger size string and one (1) set for the smaller size string of drill pipe.

b. Two (2) sets of pipe rams for the larger size string and one (1) set of variable bore pipe rams to fit both sizes of pipe.

c. Two (2) sets of variable bore pipe rams to fit both sizes of pipe.

d. Two (2) sets of pipe rams for the larger size string. The blind ram cavity shall be equipped with blind shear rams

and the blind ram actuator shall be converted to operate the blind shear rams. A crossover sub to the largest size pipe shall be readily available on the rig floor.

e. One (1) set of pipe rams for the larger size string and one (1) set of variable bore pipe rams to fit both sizes of pipe.

f. One (1) set of pipe rams for the larger size string, one (1) set of pipe rams for the smaller pipe, and one (1) set of variable bore pipe rams to fit both sizes of pipe.

* * * * *

Subparagraph 5.7.1, *BOP Testing Frequency,* Subparagraph 5.7.2, *Pressure Testing of Surface BOP Systems,* and Subparagraph 5.7.3, *Pressure Testing of Subsea BOP Systems*

Comments. Several commenters agreed with the proposed revision of subparagraph 5.7.1, Item c, which was proposed for the Gulf of Mexico and Pacific Areas only. This revision would require blind and blind shear rams to be tested prior to drilling out after each casing string has been set, instead of requiring these rams to be tested weekly. All of the commenters suggested that the revision should be applicable to all Areas of the OCS.

Discussion. As a result of comments received at the public meeting on May 20, 1980, it was concluded that, due to the variations in drilling rates for all Areas of the OCS, adopting the proposed revision for all Areas would result in the blind rams and blind shear rams being tested after a time lapse of 1 week to 2 months. Several BOP manufacturers suggested that this frequency would be entirely satisfactory for testing blind and blind shear rams. This contention is based on the fact that the sealing surfaces of blind and blind shear rams are not subjected to as much friction wear as occurs with pipe rams; therefore, the seal life is longer and requires less testing.

The USGS agrees with this contention and has revised the requirements for all areas of the OCS. Since this revision pertains to the frequency of testing, it was recognized that it would be editorially simpler and clearer to revise subparagraph 5.7.1, BOP Testing Frequency. Therefore, we have revised subparagaphs 5.7.1, 5.7.2, and 5.7.3 for all Areas of the OCS as set forth below in italics. It should be noted that an additional sentence has been inserted after the first sentence of item "c" of subparagraph 5.7.1. This sentence was formerly contained in item "d" of subparagraph 5.7.4. Refer to the Discussion of the revision of subparagraph 5.7.4.

Final Revision of OCS Order No. 2, Subparagraph 5.7.1, BOP Testing Frequency, Subparagraph 5.7.2, Pressure Testing Surface BOP Systems, and Subparagraph 5.7.3, Pressure Testing of Subsea BOP Systems

All OCS Areas:

5.7.1 *BOP Testing Frequency.* Surface and subsea BOP stacks shall be tested as follows:

* * * * *

c. At least once each week, but not exceeding 7 days between tests, alternating between control stations. *If either control system is not functional, further drilling operations shall be suspended until that system becomes operable.* A period of more than 7 days between blowout-preventer tests is allowed when well operations prevent testing and remedial efforts are being performed, provided the tests will be conducted as soon as possible before normal operations resume, and the reason for postponing testing is entered into the log. Well operations which prevent testing are stuck drilling pipe and pressure-control operations. Testing shall be at staggered intervals to allow each drill crew to operate the equipment.

The weekly test is not required for blind and blind shear rams. These rams need only be tested prior to drilling out after each casing string has been set.

* * * * *

5.7.2. *Pressure Testing Surface BOP Systems.*

Gulf of Mexico:

The last two sentences of subparagraph 5.7.2 are hereby deleted. These sentences were rendered redundant by the revision of subparagraph 5.7.1, Item c.

5.7.3 *Pressure Testing Subsea BOP Systems.*

Gulf of Mexico:

The last two sentence of subparagraph 5.7.3 is hereby deleted. This sentence was rendered redundant by the revision of subparagraph 5.7.1, Item c.

Subparagraph 5.7.4, *Actuation of Surface BOP Systems,* and Subparagraph 5.7.5, *Actuation of Subsea BOP Systems*

Comments. Several commenters objected to the "partial actuation" requirement of these subparagraphs when tapered drill strings are in use because there is no reliable way to assure that the smaller size rams would not close completely on the pipe and thereby damage the rams and the pipe. Other commenters objected to the frequency of the daily and every other day requirement for the actuation of surface and subsea BOP pipe rams. At the public meeting on May 20, 1980, several BOP manufacturers expressed their opinion that the actuation of rams required during the weekly pressure test is adequate to assure the reliabiity of the BOP stack. It was contended that daily and every other day action of the rams could result in unnecessary "wear and tear."

Discussion. In consideration of all of the comments, the USGS has reevaluated the rationale for the actuation tests and has revised the Orders as set forth below:

It should be noted that the last sentence of item "d" of the deleted subparagraph 5.7.4 has been incorporated into item "c" of the revised subparagraph 5.7.1.

Final Revision of OCS Order No. 2, Subparagraphs 5.7.4, Actuation of Surface BOP Systems, and 5.7.5, Actuation of Subsea BOP Systems

All OCS Areas:

The existing subparagraphs 5.7.4 and 5.7.5 are hereby deleted in their entirety, and a revised subparagraph 5.7.4 is hereby adopted as set forth below:

5.7.4 *Actuation of Auxiliary Well-Control Equipment.* In conjunction with the weekly pressure test of surface and subsea BOP systems, auxiliary well-control equipment such as choke manifold valves, kelly cocks, and drill pipe safety valves shall be actuated. Casing safety valves shall be actuated prior to running casing.

Subparagraph 5.8, *Inspection and Maintenance (BOP Systems)*

Comments. Several commenters objected to the requirement that all BOP systems, marine risers, and associated equipment shall be inspected and maintained in accordance with the manufacturers' recommended procedures.

Discussion. The USGS believes this comment has merit and has revised subparagraph 5.8 as set forth below in italics.

Final Revision of OCS Order No. 2, Subparagraph 5.8, Inspection and Maintenance

All OCS Areas:

5.8 *Inspection and Maintenance.* All BOP systems, marine risers, and associated equipment shall be inspected and maintained *to assure that the equipment will function properly. The manufacturers' recommended inspection and maintenance procedures are acceptable as guidelines in*

complying with this requirement. The BOP systems and marine risers shall be visually inspected at least once each day if the weather and sea conditions permit the inspection. Inspection of subsea installations may be accomplished by the use of television equipment.

Subparagraph 5.9, *Blowout-Preventer Drills*

Comments. Several commenters objected to the wording of the sentence which provides that a blowout-preventer drill may be required by a USGS designated representative at any time during the drilling operation. It was contended that, "The authority for the USGS representative to call for a BOP drill should be tempered to require some discretion in the Drilling Supervisor."

Discussion. The USGS reaffirms the rationale contained in the April 10 Notice. However, it is intended to clarify the intent of the requirement by rewording the subparagraph as indicated below in italics.

Final Revision of OCS Order No. 2, Subparagraph 5.9, Blowout-Preventer Drills

All OCS Areas:

5.9 *Blowout-Preventer Drills.* All drilling personnel shall be indoctrinated in blowout-preventer drills and be familiar with the blowout-preventer equipment before starting work on the well. A blowout-preventer drill shall be conducted for each drilling crew in accordance with the well-control drill requirements of the U.S. Geological Survey (USGS) Outer Continental Shelf Standard "Training and Qualifications of Personnel in Well-Control Equipment and Techniques for Drilling on Offshore Locations," No. T 1 (GSS–OCS–T 1), First Edition, December 1977, and subsequent revisions thereto. A BOP drill may be required by a USGS designated representative at any time during the drilling operation, after notifying *and consulting with* the lessee's senior representative present.

All BOP drills shall be recorded in the driller's report.

Subparagraph 6.1, *Mud Control*

Comments. It was contended that subparagraph 6.1, item "b," should be tempered to allow some reasonable difference in the weight of returning mud and the weight of mud entering the hole. One commenter suggested an allowable mud weight difference of 0.2 pound per gallon, and another commenter suggested an allowable difference of 1 percent.

Discussion. The USGS agrees with this contention and hereby revises subparagraph 6.1, item "b," as follows:

Final Revision of OCS Order No. 2, Subparagraph 6.1, Mud Control,

Item "b."

All OCS Areas:

6.1 *Mud Control.*

* * * * *

b. The weight of the returning mud is essentially the same as the weight of the mud entering the hole. In the event that the returning mud is lighter than the entering mud by a weight differential equal to or greater than 0.2 pound per gallon, the lessee shall circulate until the annular volume is displaced, and check the mud properties for the influx of gas or liquid.

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OCS Order No. 5

Subparagraph 3.2, *Specification for Subsurface-Safety Valves*

Comment. It was suggested that this paragraph be revised to allow the use of valves that had been qualified by performance test to a previous edition of "API Specification for Subsurface Safety Valves," API Spec 14A, during the performance test effectivity.

Discussion. The USGS has revised subparagraph 3.2, as set forth below in italics, to allow the use of previous qualified valves for the duration of the 3-year qualification period. These valves must then be requalified to the Fourth Edition of API Spec 14A as required by section 4.2 of API Spec 14A if manufacturing is to be continued.

It should be noted that we have also revised subparagraph 3.2 for the Gulf of Alaska and Atlantic Areas to address future replacement of subsurface-safety valves and to define the term "replacement."

Comment. Another commenter expressed his agreement with the proposed revision pertaining to subsurface-safety valves and recommended that a similar revision be included for surface-safety valves.

Discussion. The USGS does not propose to revise Subparagraph 4.3, *Specifications for Wellhead Surface-Safety Valves (SSV),* because these valves are required to conform to API Spec 14D, Second Edition, November 1977, as amended by Supplement 2, November 1978. Section 4.2 of this document states that "performance testing is not required for SSV equipment other than valves for Class 2 service." Periodic retesting is a requirement of API Spec 14A. There is no retest requirement in API Spec 14D.

Final Revision of OCS Order No. 5, Subparagraph 3.2, Specification for Subsurface Safety Valves

Gulf of Mexico and Pacific:

3.2 *Specification for Subsurface-Safety Valves.* Surface-controlled and subsurface-controlled subsurface-safety valves required by subparagraphs 3.4 and 3.5, which are installed on new installations or replaced on old installations after February 1, 1980, shall conform to "American Petroleum Institute (API) Specification for Subsurface Safety Valves," API Spec 14A, Fourth Edition, November 1979, or subsequent revisions which the *Deputy Chief, Conservation Division—Offshore Minerals Regulation,* has approved for use at the time of installation. *A valve qualified to a previous edition of API SPEC 14A is acceptable provided that the valve enters inventory within 3 years of its qualifying performance test date.*

For purposes of this requirement, the term "replacement" is defined as occurring when that portion of the valve assembly containing the serial number is removed from inventory and a new certified valve is placed in inventory.

Gulf of Alaska and Atlantic:

3.2 *Specification for Subsurface-Safety Valves.* Surface-controlled and subsurface-controlled subsurface-safety valves required by subparagraphs 3.4 and 3.5, *which are installed or replaced* shall conform to "American Petroleum Institute (API) Specification for Subsurface Safety Valves," API Spec 14A, Fourth Edition, November 1979, or subsequent revisions which the *Deputy Chief, Conservation Division—Offshore Minerals Regulation,* has approved for use at the time of installation. *A valve qualified to a previous edition of API Spec 14a is acceptable provided that the valve enters inventory within 3 years of its qualifying performance test date.*

For purposes of this requirement, the term "replacement" is defined as occurring when that portion of the valve assembly containing the serial number is removed from inventory and a new certified valve is placed in inventory.

OCS Order No. 7

Subparagraph 1.1.3.b, *Curbs, Gutters, and Drains for Mobile Drilling Units*

Comments. One commenter agreed with the final version of this Order, and another suggested that the Order does not provide a reasonable amount of time to accomplish the necessary installation work for curbs, gutters, and drains in mobile drilling units.

Discussion. The USGS reiterates the rationale for the final version of this Order as published in the Federal

Register on April 10. Approval for extending the time for compliance with this requirement will only be granted by the District Supervisor after review on a case-by-case basis.

Subparagraph 1.2.3, *Equipment (Disposal)*

Comments. One commenter stated "The requirement to report 'The location and description of *any* equipment disposed of * * *' is extremely burdensome both for the lessee and the agencies." The commenter appealed this requirement "* * * as unnecessary and unreasonable in the light of paragraph 4 of OCS Order No. 1."

Discussion. As previously stated, the requirements of paragraph 4 of OCS Order No. 1 have been revised to provide limitations on the reporting of intentional and accidentally submerged objects. Consistent with this revision, the word "any" and the phrase "to the District Supervisor" have been deleted from the second sentence of the subparagraph. Subparagraph 1.2.3 is hereby revised as set forth below.

Final Revision of OCS Order No. 7, Subparagraph 1.2.3 Equipment

All OCS Areas:

1.2.3 *Equipment.* Disposal of equipment into the ocean is prohibited except under emergency conditions. The location and description of equipment disposed of into OCS waters shall be reported to the U.S. Coast Guard in accordance with paragraph 4 of OCS Order No. 1.

Subparagraph 2.2.2, *Unattended Facilities (Inspection)*

Comments. Several commenters objected to the daily inspection requirement for unattended platforms. It was suggested that these facilities should be inspected weekly and that the subparagraph should provide an exception in the event of prohibitive weather.

Discussion. The USGS does not agree with the suggestion of weekly inspections. Early detection of a leak or equipment malfunction is the key to pollution prevention. The phrase "or at intervals prescribed by the District Supervisor" provides latitude to waive the daily inspection requirement for those unmanned facilities which have a consistent record of pollution-free operation. In order to provide relief in the event of adverse weather conditions, the subparagraph has been revised as indicated below in italics.

Final Revision of OCS Order No. 7, Subparagraph 2.2.2, Unattended Facilities

2.2.2 *Unattended Facilities.* Unattended facilities, including those equipped with remote control and monitoring systems, shall be inspected daily or at intervals prescribed by the District Supervisor to determine if pollution is occurring. *Daily inspections may be postponed in the event of adverse weather conditions.* Necessary maintenance or repairs shall be made immediately.

Subparagraph 3.2, *Oil Spill Contingency Plans*

Comments. One commenter objected to the requirement that the oil spill contingency plan shall contain provisions for identifying and protecting areas of special biological sensitivity. It was contended that the requirement is unclear and does not provide a time for existing plans to be brought into compliance.

Another commenter stated "Oil Spill Contingency Plans are already required" and contended that, if the particular facility/rig/platform does not involve a sensitive area, there is no real need for such plan to include additional stringent requirements to protect sensitive areas.

Discussion. The intent of this requirement is for the operator to state in his plan the procedures he would use in the event of an oil spill to protect areas of special biological sensitivity such as waterfowl, fish, oyster beds, and other aquatic life.

In order to provide a time for existing plans to be brought into compliance, subparagraph 3.2 is revised as set forth below in italics.

Final Revision of OCS Order No. 7, Subparagraph 3.2, Oil Spill Contingency Plan

All OCS Areas:

3.2 *Oil Spill Contingency Plans.* The lessee shall submit an Oil Spill Contingency Plan for approval by the *Deputy Conservation Manager (DCM), Offshore Field Operations,* with or prior to submitting an Exploration Plan or a Development and Production Plan. *Existing Oil Spill Contingency Plans which do not conform to the requirements of this subparagraph shall be modified and submitted to the DCM, Offshore Field Operations, for approval by December 15, 1980.* Oil Spill Contingency Plans shall be reviewed annually. All modifications of the Oil Spill Contingency Plans and the results from the review of the plan shall be submitted to the *DCM, Offshore Field Operations,* for approval. The Oil Spill Contingency Plan shall contain the following:

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